



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael E. Daniels, Jr.
Governor

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Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.in.gov/idem

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a Part 70 Permit

for Weiss Prestaining, Inc. in LaPorte County

Significant Permit Modification No.: 091-20486-00069

The Indiana Department of Environmental Management (IDEM), has received an application from Weiss Prestaining, Inc., located at 3522 South SR 104, LaPorte, Indiana for a Significant Modification to their Part 70 Permit issued on September 28, 1998. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Weiss Prestaining, Inc. to make certain changes at their existing source. Weiss Prestaining, Inc. has applied to operate an automated vinyl trim spray paint booth, identified as Unit 8. If operated 365 days a year, 24 hours a day, 7 days a week, the proposed spray paint booth could potentially release 45.6 tons of PM, 45.6 tons of PM₁₀, and 85.3 tons of VOC per year. The modification will limit VOC emissions from Unit 7 and 8 to no more than 9.90 tons and 24.5 tons per year, respectively. In addition, this modification will limit PM and PM₁₀ from Unit 8 to no more than 13.8 tons per year, each. The permit requires VOC usage and solid input limits as well as the use of dry particulate filters to limit the amount of air pollution that can be released. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

LaPorte County Public Library
904 Indiana Ave.
LaPorte, IN 46350-3407

And

Northwest Regional Office
8315 Virginia Avenue
Suite 1
Merrillville, IN 46410-9201

A copy of the preliminary findings is available on the Internet at:

www.IN.gov/idem/air/permits/Air-Permits-Online.

How can you participate in this process?

The day after this announcement is published in a newspaper marks the beginning of a 30-day public comment period. During that 30-day period, you may comment on this draft permit. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM may hold a public hearing. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing. At a hearing, you would have an opportunity to submit written comments, make verbal comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM. If you do not want to comment at this time, but would like to be added to IDEM's mailing list to receive notice of future action related to this permit application, please contact IDEM. Please refer to permit number SPM 091-20486-00069 in all correspondence.

To Contact IDEM:

Michael S. Schaffer
IDEM, Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(800) 451-6027, ask for extension (631) 691-3395
Or dial directly: (631) 691-3395 extension 23
E-mail: mschaffer@mesamity.com

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate, Indianapolis and 8315 Virginia Avenue, Suite 1, Merrillville.

If you have any questions please contact Michael S. Schaffer or my staff at the above address.

Original Signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.IN.gov/idem/guides.

MSS:MES



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DRAFT

Mr. Steve Richter
Weiss Prestaining, Inc.
P.O. Box 650
North Liberty, IN 46554

Re: **091-20486-00069**
Third Significant Permit Modification to
Part 70 No.: T 091-7626-00069

Dear Mr. Richter:

Weiss Prestaining, Inc. was issued a permit on September 28, 1998 for a stationary exterior wood siding surface coating operation. A letter requesting changes to this permit was received on December 2, 2004. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of following changes:

- (a) Unit 8 has been added as paragraph (e) in Condition A.2 and the equipment description box for Section D.4;
- (b) Conditions D.4.1(a) through (c) as well as Condition D.4.8 and quarterly report forms to document to compliance with Conditions D.4.1(a) through (c) have been added to ensure that:
 - (1) The VOC emissions from Unit 8 are limited to less than twenty-five (25) tons per year;
 - (2) The VOC emissions from Unit 7 are limited to less than ten (10) tons per year;
 - (3) The VOC emissions from Units 7 and 8 are limited to less than a total of forty (40) tons per year;
 - (4) The PM and PM₁₀ emissions from Unit 8 before controls are limited to less than twenty-five (25) tons per year, each; and
 - (5) The PM and PM₁₀ emissions from Units 7 and 8 after controls are limited to less than a total of fifteen (15) tons per year, each.

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Therefore, the limits in Conditions D.4.1(a) and (b) are necessary to render the requirements of 326 IAC 2-7-10.5(f), Major New Source Review, and 326 IAC 8-1-6 not applicable to the construction and operation of Unit 8;

- (c) The requirements of 40 CFR 63, Subpart PPPP have been removed from Section D.4 since Units 7 and 8 do not use any coatings that contain HAPs; and
- (d) Unit 8 has been included in the appropriate existing requirements for Unit 7 in Conditions D.4.2 through D.4.7.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 23 or in Indiana at 1-800-451-6027 (ext. 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

MSS/MES

cc: File - LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Letty Zepeda
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michelle Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Weiss Prestaining, Inc.
3522 South SR 104
LaPorte, Indiana 46350

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 091-7626-00069	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Quality	Issuance Date: September 28, 1998 Expiration Date: September 28, 2003

First Significant Permit Modification No.: 091-11522-00069, issued on March 30, 2000

First Reopening No.: 091-13381-00069, issued on January 3, 2002

First Administrative Amendment No.: 091-19393-00069, issued on August 10, 2004

Second Significant Permit Modification No.: 091-19505-00069, issued on December 8, 2004

Third Significant Permit Modification No.: 091-20486-00069	Pages Affected: 3a, 4, and 27d - 27g Pages Added: 30b through 30d
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

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Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.6 Record Keeping Requirements

D.3.7 Reporting Requirements

D.4 FACILITY OPERATION CONDITIONS: Plastic Products Surface Coating Booth 27d

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC), Particulate Matter (PM), and Particulate Matter Less

Than Ten Microns (PM₁₀) [326 IAC 2-2] [326 IAC 2-1.1-5] [326 IAC 2-7-10.5]
[326 IAC 8-1-6]

D.4.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

D.4.3 Particulate [326 IAC 6-3-2(d)] [326 IAC 2-2]

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

D.4.8 Reporting Requirements

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary exterior wood siding surface coating operation.

Responsible Official:	Vice President
Source Address:	3522 South SR 104, LaPorte, IN 46350
Mailing Address:	P.O Box 650, North Liberty, IN 46554
General Source Phone Number:	219-369-9111
SIC Codes:	2499 and 3089
County Location:	LaPorte
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules and Nonattainment NSR; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Four (4) flowcoating machines, identified as Units 1, 2, 3, and 4A, coating wood boards and panels with a combined capacity of 5,833.34 square feet per hour, with Unit 2 exhausting through Stack ID# V-1. One (1) dry room and one (1) dry area with four (4) general ventilation fans, identified as GV-1, GV-2, GV-3, and GV-4, are used to dry the boards. One (1) dip coat bucket, used to coat nails with a capacity of 3.88 pounds per hour, is exhausted to general ventilation.
- (b) One (1) latex/oil based flow coater, known as Machine #5, exhausted to general ventilation fans 1,2,3 and 4, capacity: 7,500 square feet of wood siding panels or boards per hour on latex or 7,000 square feet of wood siding panels or boards per hour on oil.
- (c) One (1) oil based/latex flow coater, known as Machine #6, exhausted to Stack V-1 and to general ventilation fans 1,2, 3 and 4, capacity: 7,000 square feet of wood siding panels or boards per hour on oil or 7,500 square feet of wood siding panels or boards per hour on latex.
- (d) One (1) manual spray paint booth, identified as Unit 7, installed in 2004, equipped with air atomized spray guns and dry filters for particulate control, exhausting to general ventilation (GV), capacity: 410.28 square feet of vinyl trim per hour.
- (e) One (1) automated spray paint booth, identified as Unit 8, to be installed in 2005, equipped with air atomized spray guns and dry filters for particulate control, exhausting to general ventilation (GV), capacity: 3,937.5 square feet of vinyl trim per hour.

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SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plastic Products Surface Coating Booths

- (d) One (1) manual spray paint booth, identified as Unit 7, installed in 2004, equipped with air atomized spray guns and dry filters for particulate control, exhausting to general ventilation (GV), capacity: 410.28 square feet of vinyl trim per hour.
- (e) One (1) automated spray paint booth, identified as Unit 8, to be installed in 2005, equipped with air atomized spray guns and dry filters for particulate control, exhausting to general ventilation (GV), capacity: 3,937.5 square feet of vinyl trim per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC), Particulate Matter (PM), and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-2] [326 IAC 2-1.1-5] [326 IAC 2-7-10.5] [326 IAC 8-1-6]

- (a) The VOC usage from Unit 8 shall not exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation shall render the requirements of Major New Source Review, 326 IAC 2-7-10.5(f), and 326 IAC 8-1-6 not applicable to Unit 8.
- (b) The VOC usage from Unit 7 shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation in combination with the limitation in paragraph (a) of this condition shall render the requirements of Major New Source Review not applicable to Units 7 and 8.
- (c) The input of solids to Unit 8 shall not exceed a total of 92.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month, based on a minimum transfer efficiency of eighty-five percent (85%), equivalent to 13.8 tons of PM and PM₁₀ per year, each. Compliance with this limitation shall render the requirements of 326 IAC 2-7-10.5(f) not applicable to Unit 8 and the requirements of Major New Source Review not applicable to Units 7 and 8.
- (d) Any change or modification that increases the potential to emit PM and PM₁₀ before controls from Unit 7 to greater than five (5) tons per year each, shall render the requirements of 326 IAC 2-7-10.5 applicable to Unit 7 and shall require prior IDEM, OAQ approval.

D.4.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from Units 7 and 8 shall each not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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D.4.3 Particulate [326 IAC 6-3-2(d)] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d) and 326 IAC 2-2, particulate from the surface coating at Units 7 and 8 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Units 7 and 8 as well as the control devices.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the emission limitation contained in Conditions D.4.1(a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Units 7 and 8 exhausts while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the Units 7 and 8 exhausts and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, PM, and PM₁₀ emission limits established in Condition D.4.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material used at Units 7 and 8.

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- (2) The amount of coating material used at Units 7 and 8 on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage at Units 7 and 8 each month; and
 - (4) The total amount of solids delivered to the applicators at Units 7 and 8 each month.
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.1(a) through (c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Weiss Prestaining, Inc.
Source Address: 3522 South SR 104, LaPorte, IN 46350
Mailing Address: P.O Box 650, North Liberty, IN 46554
Part 70 Permit No.: T 091-7626-00069
Facility: Automated spray paint booth (Unit 8)
Parameter: VOC usage
Limit: Not to exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this month.
- ☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Weiss Prestaining, Inc.
Source Address: 3522 South SR 104, LaPorte, IN 46350
Mailing Address: P.O Box 650, North Liberty, IN 46554
Part 70 Permit No.: T 091-7626-00069
Facility: Manual spray paint booth (Unit 7)
Parameter: VOC usage
Limit: Not to exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this month.
- ☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Weiss Prestaining, Inc.
Source Address: 3522 South SR 104, LaPorte, IN 46350
Mailing Address: P.O Box 650, North Liberty, IN 46554
Part 70 Permit No.: T 091-7626-00069
Facility: Automated spray paint booth (Unit 8)
Parameter: Input of Solids
Limit: Not to exceed a total of 92.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month, equivalent to 13.8 tons of PM and PM₁₀ per year, each.

YEAR: _____

Month	Input of Solids (tons)	Input of Solids (tons)	Input of Solids (tons)
	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this month.
- ☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and Significant Permit Modification

Source Background and Description

Source Name:	Weiss Prestaining, Inc.
Source Location:	3522 South SR 104, LaPorte, Indiana 46350
County:	LaPorte
SIC Codes:	2499 and 3089
Operation Permit No.:	T 091-7626-00069
Operation Permit Issuance Date:	September 28, 1998
Minor Source Modification No.:	MSM 091-20438-00069
Significant Permit Modification No.:	SPM 091-20486-00069
Permit Reviewer:	Michael S. Schaffer

The Office of Air Quality (OAQ) has reviewed a modification application from Weiss Prestaining, Inc. relating to the construction and operation of the following emission unit and pollution control device:

- (d) One (1) automated spray paint booth, identified as Unit 8, to be installed in 2005, equipped air atomized spray guns and dry filters for particulate control, exhausting to general ventilation (GV), capacity: 3,937.5 square feet of vinyl trim per hour.

History

Weiss Prestaining, Inc. was issued a Part 70 Operating Permit on September 28, 1998. On March 30, 2000, Weiss Prestaining, Inc. was issued First Significant Permit Modification 091-11522-00069, which incorporated into the Part 70 Operating Permit the operating conditions, from CP 091-9572-00069, issued on December 1, 1998, for the two (2) latex/oil based flow coaters, identified as Machines #5 and #6. On January 3, 2002, Weiss Prestaining, Inc. was issued Reopening 091-13381-00069 to revise the language in Condition B.11(c)(3) of the Part 70 Operating Permit. On August 10, 2004, Weiss Prestaining, Inc. was issued First Administrative Amendment 091-19393-00069 to change the responsible official listed in Condition A.1 of the Part 70 Operating Permit from "Greg Weiss" to "Vice President." On December 8, 2004, Weiss Prestaining, Inc. was issued Second Significant Permit Modification 091-19505-00069, for the operation of a manual spray paint booth, identified as Unit 7, which coats vinyl trim.

On December 2, 2004, Weiss Prestaining, Inc. submitted an application to the OAQ requesting to add an automated spray paint booth to their existing plant for the purposes of coating vinyl trim. That spray paint booth, which is identified as Unit 8, has an unrestricted potential to emit of greater than twenty-five (25) tons of VOC, PM, and PM₁₀.

There will now be two (2) vinyl trim coating operations at this source. Therefore, in order to render the requirements of Major New Source Review, 326 IAC 2-7-10.5, and 326 IAC 8-1-6 not applicable to this modification, the source has proposed:

- (a) To limit the total VOC usage from Unit 8 to less than twenty-five (25) tons per year;
- (b) To limit the total VOC usage from Unit 7 to less than ten (10) tons per year which in combination with paragraph (a) limits the total VOC usage from Units 7 and 8 to less than forty (40) tons per year; and

- (c) To limit the input of solids to Unit 8, based on a minimum transfer efficiency of eighty-five (85%), such that the PM and PM₁₀ emissions from Unit 8 before controls will be less than twenty-five (25) tons per year each, and the total PM and PM₁₀ emissions from Units 7 and 8 after controls will be less than fifteen (15) tons per year, each.

Since the source has requested to limit Units 7 and 8 as stated in paragraphs (a) through (c), the construction of Unit 8 is considered a minor source modification pursuant to 326 IAC 2-7-10.5(d)(4)(A) and (E), rather than a significant source modification that would have been required without the proposed VOC usage and solid input limits.

Weiss Prestaining, Inc. is a major PSD and nonattainment new source review source. Since the manual vinyl trim coating spray paint booth, identified as Unit 7, is spray painting the same type of product as what is going to be painted at Unit 8, the increase in emissions from Unit 7 will count towards the Major New Source Review applicability of this modification. Therefore, the proposed limits in paragraphs (b) and (c) are necessary to make this modification a minor modification under the Major New Source Review requirements.

In addition, the approval to operate Unit 8 will be a Part 70 Significant Permit Modification in accordance with 326 IAC 2-7-12(d). Pursuant to 326 IAC 2-7-12(d)(1), any modification that requires a significant change to the Part 70 Operating Permit is considered a significant permit modification. Since additional limits, record keeping, and reporting requirements will result from this modification, there will be significant changes made to the Part 70 Operating Permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

There are no stacks associated with this modification.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 2, 2004. Additional information was received on January 4, 2005.

Emission Calculations

Since the Permittee has claimed confidentiality on the paint used in Unit 8, a detailed assessment of the emissions from Unit 8 has not been included with this document. Potential emissions estimated from the applicant are listed in the Potential To Emit of Modification Section below.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored,

or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.

This table reflects the PTE before controls for this modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	45.6
PM ₁₀	45.6
SO ₂	-
VOC	85.3
CO	-
NO _x	-

Note that there are no potential HAPs emissions associated with the construction and operation of Unit 8.

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5 (d)(4)(A) and (E) as a modification that limits the VOC usage from Unit 8 to less than twenty-five (25) and as a modification that limits the input of solids (raw material) such that the PM and PM₁₀ emissions before controls from Unit 8 are each less than twenty-five (25) tons per year, each.

Note that the coating is considered a "raw material" because it is a product that is in its natural state being used to manufacture a finished product (vinyl trim). Therefore, a limit on the input of solids can be considered a limit on the input of raw material.

The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 131-18143-00017) in accordance with 326 IAC 2-7-12(d)(1).

The Significant Permit Modification will provide the source with approval to operate Unit 8 with a VOC usage limit that renders the requirements of Major New Source Review, 326 IAC 2-7-10.5(f), and 326 IAC 8-1-6 not applicable.

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	marginal nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) LaPorte County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Less Than 100
PM ₁₀	Less Than 100
SO ₂	Less Than 100
VOC	Greater Than 100
CO	Less Than 100
NO _x	Less Than 100

- (a) This existing source is a major stationary source because a nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or more.
- (b) These emissions are based upon the emission from the TSD to T 091-7626-00069, issued on September 28, 1998 in combination with the TSD to CP 091-9572-00069, issued on December 1, 1998, the TSD to MSM 091-18128-00069, issued on November 12, 2004, and the TSD to SPM 091-19505-00069, issued on December 8, 2004.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 permit modification.

Pollutant	PM (tons/yr)	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (tons/yr)
Unit 7 (permitted to operate from 091-19505-00069, issued on December 8, 2004)	0.243	0.243	-	9.90	-	-
Unit 8	0.690	0.690	-	24.5	-	-
Total Emissions	0.933	0.933	-	34.4	-	-
Major New Source Review Significant Level	25	15	40	40	100	40

Note 1: The potential PM and PM₁₀ emissions from Unit 8 will each be limited to 13.8 tons per year before controls (see paragraph (a)(3) below).

Note 2: Since Unit 8 is coating the same type of product as Unit 7 and SPM 091-19505-00069 (the approval to operate Unit 7) was issued within the last twelve (12) months, the emissions from Unit 7 have been counted towards Major New Source Review applicability.

(a) As part of this modification, the source has elected to:

- (1) Limit the VOC usage from Unit 8 to no more than 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation shall render the requirements of 326 IAC 2-7-10.5(f), and 326 IAC 8-1-6 not applicable Unit 8;
- (2) Limit the VOC usage from Unit 7 to no more than 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation in combination with paragraph (a)(1) shall render the requirements of Major New Source Review not applicable to Units 7 and 8; and
- (3) Limit the input of solids to Unit 8 to no more than a total of 92.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month, based on a minimum transfer efficiency of eighty-five (85%), equivalent to 13.8 tons of PM and PM₁₀ per year, each. Compliance with this limitation shall render the requirements of 326 IAC 2-7-10.5(f) not applicable to Unit 8 and the requirements of Major New Source Review not applicable to Units 7 and 8.

(b) This modification to an existing major stationary source is not major because the emissions increase is less than the Major New Source Review significant levels. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-1.1-5, the Major New Source Review requirements do not apply.

Federal Rule Applicability

- (a) This modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC, PM and PM₁₀:
 - (1) With the potential to emit before controls equal to or greater than the major source threshold for VOC, PM and PM₁₀;
 - (2) That is subject to an emission limitation or standard for VOC, PM and PM₁₀; and

- (3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) Prior to the issuance of SPM 173-19505-00069 on December 8, 2004, Unit 7, which is currently the only facility operating at this source that coats plastic, was subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart PPPP, pursuant to 40 CFR 63.4481(b), because:

- (1) the entire source was a major source of HAPs,
- (2) the affected source was projected to use more than 100 gallons (378 liters) of coatings per year, and
- (3) the coatings that were projected to be used at the affected source did not meet the definition of non-HAP coatings pursuant to 40 CFR 63.4581.

However, as of November 29, 2004, the HAP that is used at Unit 7 was delisted by U.S. EPA. As a result, pursuant to 40 CFR 63.4581, Unit 7 is now using a coating that meets the non-HAP definition. Therefore, Unit 7 was not going to use more than 100 gallons (378 liters) of HAP coatings per year and the requirements of 40 CFR 63, Subpart PPPP were no longer applicable.

In addition, Unit 8 will only be using coatings that do not contain any HAPs. Therefore, Unit 8 is not subject to the requirements of 40 CFR 63, Subpart PPPP because that spray paint booth will not be using more than 100 gallons (378 liters) of HAP coatings per year.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
326 IAC 2-1.1-5 (Nonattainment New Source Review)
326 IAC 2-7-10.5 (Part 70 Source Modification)

- (a) This source is considered an existing major PSD and nonattainment new source review source since the potential to emit VOC from the entire source is greater than one hundred (100) tons per year.
- (b) In order to limit the potential to emit VOC from this modification to less than twenty-five (25) tons per year and in order to limit the potential to emit VOC from this modification in combination with Unit 7 (SPM 091-19505-00069) to less than forty (40) tons per year:
 - (1) The VOC usage from Unit 8 shall not exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
 - (2) The VOC usage from Unit 7 shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) In order to limit the potential to emit PM and PM₁₀ from Unit 8 to less the twenty-five (25) tons per year, each before controls and in order to limit the potential to emit PM and PM₁₀ from

Units 7 and 8 to less than fifteen (15) tons per year after controls:

The input of solids to Unit 8 shall not exceed a total of 92.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month, based on a minimum transfer efficiency of eighty-five percent (85%), equivalent to 13.8 tons of PM and PM₁₀ per year, each.

- (d) Compliance with the limits in paragraph (b) shall render the requirements of Major New Source Review, 326 IAC 2-7-10.5(f), and 326 IAC 8-1-6 not applicable to this modification.

326 IAC 2-4.1-1 (New Source Toxics Control)

The construction of Unit 8 is for the purposes of coating additional plastic product. However, there are no potential HAPs emissions associated with the construction and operation of Unit 8. Therefore, the requirements of 326 IAC 2.4.1-1 do not apply to Unit 8.

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the Unit 8 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the surface coating at Unit 8 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications

326 IAC 8-1-6 (New facilities; General Reduction Requirements)

The proposed Unit 8 will not be regulated by any other provision of 326 IAC 8 because there are no limitations in the other provisions of 326 IAC 8 that are applicable to the surface coating of vinyl trim.

Therefore, as part of this modification, this source has elected to limit the VOC usage from Unit 8 to no more than 24.5 tons per twelve (12) consecutive month with compliance determined at the end of each month. Compliance with this limitation shall render the requirements of 326 IAC 8-1-6 not applicable to Unit 8.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules

contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Unit 8 exhaust while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the Unit 8 exhaust and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

The dry filters for the Unit 8 must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Limitations), 326 IAC 6-3 (Process Operations), 326 IAC 2-7 (Part 70), and Major New Source Review.

Testing Requirements

Compliance with the VOC usage and solid input limits for Unit 7 and 8 can be demonstrated through non-testing compliance determination requirements as well as record keeping and reporting requirements. In addition, there are no VOC, PM, and PM₁₀ emission factor limitations that are applicable to Units 7 and 8. Therefore, no stack testing will be required in this modification.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Change 1:

The words "manual" and "air atomized spray guns and" will be added to Condition A.2(d) and the proposed Unit 8 will be added as Condition A.2(e) and to the equipment description box in Section D.4 as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

- (d) One (1) **manual** spray paint booth, identified as Unit 7, ~~to be~~ installed in 2004, equipped with **air atomized spray guns and** dry filters for particulate control, exhausting to general ventilation (GV), capacity: 410.28 square feet of vinyl trim per hour.
- (e) **One (1) automated spray paint booth, identified as Unit 8, to be installed in 2005, equipped with air atomized spray guns and dry filters for particulate control, exhausting to general ventilation (GV), capacity: 3,937.5 square feet of vinyl trim per hour.**

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plastic Products Surface Coating Booths

- (d) One (1) **manual** spray paint booth, identified as Unit 7, ~~to be~~ installed in 2004, equipped with **air atomized spray guns and** dry filters for particulate control, exhausting to general ventilation (GV), capacity: 410.28 square feet of vinyl trim per hour.
- (e) **One (1) automated spray paint booth, identified as Unit 8, to be installed in 2005, equipped with air atomized spray guns and dry filters for particulate control, exhausting to general ventilation (GV), capacity: 3,937.5 square feet of vinyl trim per hour.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Change 2:

Since the requirements of 40 CFR 63, Subpart PPPP no longer apply to this source, Conditions D.4.1, D.4.2, D.4.10, and D.4.11 will be deleted as follows:

~~D.4.1. General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]~~

- ~~(a) The provisions of 40 CFR Part 63, Subpart A—General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2007.~~
- ~~(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~

~~D.4.2. National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]~~

- (a) ~~The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.~~
- (b) ~~Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~
- (c) ~~The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:~~
 - (1) ~~All coating operations as defined in 40 CFR 63.4581;~~
 - (2) ~~All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;~~
 - (3) ~~All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and~~
 - (4) ~~All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.~~
- (d) ~~Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.~~

D.4.10 Notification Requirements [40 CFR 63.4510]

- (a) ~~General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).~~
- (b) ~~Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.~~
- (c) ~~Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).~~

D.4.11 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

~~The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.~~

- ~~(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.~~
- ~~(b) The significant permit modification application shall be submitted no later than July 19, 2006.~~
- ~~(c) The significant permit modification application shall be submitted to:~~

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Change 3:

Since this source has elected to limit the VOC usage as well as the input of solids as part of this modification, Conditions D.4.1(a) and (c) will be added and Condition D.4.3(b) (now Condition D.4.1(b)) will be revised as follows:

D.4.3 1 Volatile Organic Compounds (VOC), Particulate Matter (PM), and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-2] [326 IAC 2-1.1-5] [326 IAC 2-7-10.5] [326 IAC 8-1-6]

- (a) The VOC usage from Unit 8 shall not exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation shall render the requirements of 326 IAC 2-7-10.5(f), and 326 IAC 8-1-6 not applicable to Unit 8.**
- (b) Any change or modification that increases the potential to emit from the proposed Unit 7 to greater than ten (10) tons of VOC per year shall render the requirements of 326 IAC 2-7-10.5 applicable to Unit 7 and shall require prior IDEM, OAQ approval. The VOC usage from Unit 7 shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation in combination with the limitation in paragraph (a) of this condition shall render the requirements of Major New Source Review not applicable to Units 7 and 8.**
- (c) The input of solids to Unit 8 shall not exceed a total of 92.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month, based on a minimum transfer efficiency of eighty-five percent (85%), equivalent to 13.8 tons of PM and PM₁₀ per year, each. Compliance with this limitation shall render the requirements of 326 IAC 2-7-10.5(f) not applicable to Unit 8 and the requirements of Major New Source Review not applicable to Units 7 and 8.**
- ~~(c)~~ **(d) Any change or modification that increases the potential to emit PM and PM₁₀ before controls from Unit 7 to greater than five (5) tons per year each, shall render the requirements of 326 IAC 2-7-10.5 applicable to Unit 7 and shall require prior IDEM, OAQ approval.**

Change 4:

Unit 8 will be included in Conditions D.4.4 through D.4.6 (now Conditions D.4.2 through D.4.3 as follows. Note that the term "This requirement to operate the control is not federally enforceable" will be deleted from Condition D.4.5 (now Condition D.4.3) as part of this modification since the source needs to operate the control device to render the requirements of Major New Source Review not

applicable.

D.4.4 2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from Units **7 and 8** shall **each** not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

~~Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$\del{E = 55.0 P^{0.44} - 40} \quad \del{\text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}}$$

D.4.5 3 Particulate [326 IAC 6-3-2(d)] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d) **and 326 IAC 2-2**, particulate from the surface coating at Units **7 and 8** shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. ~~This requirement to operate the control is not federally enforceable.~~

D.4.6 4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Units **7 and 8** as well as the control devices.

Change 5:

As a result Changes 3 and 4, Conditions D.4.7 through D.4.9 (now Conditions D.4.5 through D.4.7) will be revised as follows:

D.4.7 5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the emission limitation contained in Conditions D.4.3 **(1)(a) and (b)** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

D.4.8 6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Units **7 and 8** exhausts while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the Units **7 and 8** exhausts and the presence of overspray on the rooftops and the nearby ground. The Com

pliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.9 7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.3 1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, PM, and PM₁₀ emission limits established in Condition D.4.3 1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material ~~and solvent~~ used at Units 7 and 8.
 - (2) The amount of coating material ~~and solvent~~ used at Units 7 and 8 on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage ~~for~~ at Units 7 and 8 each month; and
 - (4) The total amount of solids delivered to the applicators at Units 7 and 8 each month.
- (b) To document compliance with Condition D.4.8 6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Change 6:

As a result of Change 3, Condition D.4.8 and a quarterly report forms at the end of the permit will be added as follows:

D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.1(a) through (c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Weiss Prestaining, Inc.
Source Address: 3522 South SR 104, LaPorte, IN 46350
Mailing Address: P.O Box 650, North Liberty, IN 46554
Part 70 Permit No.: T 091-7626-00069
Facility: Automated spray paint booth (Unit 8)
Parameter: VOC usage
Limit: Not to exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this month.
- ☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Weiss Prestaining, Inc.
Source Address: 3522 South SR 104, LaPorte, IN 46350
Mailing Address: P.O Box 650, North Liberty, IN 46554
Part 70 Permit No.: T 091-7626-00069
Facility: Manual spray paint booth (Unit 7)
Parameter: VOC usage
Limit: Not to exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this month.
- ☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Weiss Prestaining, Inc.
Source Address: 3522 South SR 104, LaPorte, IN 46350
Mailing Address: P.O Box 650, North Liberty, IN 46554
Part 70 Permit No.: T 091-7626-00069
Facility: Manual spray paint booth (Unit 8)
Parameter: Input of Solids
Limit: Not to exceed a total of 92.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month, equivalent to 13.8 tons of PM and PM₁₀ per year, each.

YEAR: _____

Month	Input of Solids (tons)	Input of Solids (tons)	Input of Solids (tons)
	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this month.
- ☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 091-20438-00069 and proposed Part 70 Significant Permit Modification No. 091-20486-00069.